

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN THE MATTER OF THE	§	
COMPLAINT AND PETITION OF	§	4:24-CV-02568
TIMTOM LAND HOLDINGS, LLC AS	§	NOTICE OF CLAIM
OWNER OF THE MV <i>JACQUES-IMO</i> ,	§	
SHAMROCK MARINE, LLC AS	§	KSENIIA TAIGACHEV, INDIVIDUALLY
OWNER OF THE T/B SHAMROCK 500	§	AND AS REP OF THE ESTATE OF
AND BUFFALO MARINE SERVICE,	§	KONSTANTIN TAIGACHEV,
INC. AS OWNER PRO HAC VICE OF	§	DECEASED, SLIZSKAIA TATIANA
<i>SHAMROCK 500</i> IN A CAUSE OF	§	GRIGORYEVNA AND KONSTANTIN
EXONERATION FROM OR	§	TAIGACHEV KONSANTINOVICH
LIMITATION OF LIABILITY	§	

**KSENIIA TAIGACHEV, INDIVIDUALLY AND AS REP OF THE ESTATE OF  
KONSTANTIN TAIGACHEV, DECEASED, SLIZSKAIA TATIANA GRIGORYEVNA  
AND KONSTANTIN TAIGACHEV KONSANTINOVICH  
INITIAL DISCLOSURES**

Respondents Kseniia Taigachev, Individually and as Representative of the Estate of Konstantin Taigachev, Deceased, Slizskaia Tatiana Grigoryevna and Konstantin Taigachev Konsantinovich files their Initial Disclosures.

I. Initial Disclosures:

A. The names, addresses and telephone numbers of each individual likely to have information that bears significantly on any claim or defense, identifying the subjects of the information:

1. Kseniia Taigachev, Individually and as Representative of the Estate of Konstantin Taigachev, Deceased; Slizskaia Tatiana Grigoryevna; and Konstantin Taigachev Konsantinovich  
c/o Brian Beckcom, Brendan Fradkin  
VB Attorneys  
7941 Katy Freeway, #312, Houston, Texas 77024  
713-224-7800  
Subject of Information: Personal knowledge of the incident, the deceased, and damages as plaintiffs and representatives of the deceased's estate

2. Representatives of Tintom Land Holdings, LLC  
As owner of the M/V JACQUES-IMO  
c/o Ronald L. White  
Wilson Elser  
909 Fannin Street, Suite 3300, Houston, TX 77010  
713-353-2000  
Subject of Information: Knowledge of the vessel's operation and the incident
3. Representatives of Shamrock Marine, LLC  
As owner of the T/B SHAMROCK 500  
c/o Ronald L. White  
Wilson Elser  
909 Fannin Street, Suite 3300, Houston, TX 77010  
713-353-2000  
Subject of Information: Knowledge of the vessel's operation and the incident
4. Representatives of Buffalo Marine Service, Inc.  
As owner pro hac vice of SHAMROCK 500  
c/o Ronald L. White  
Wilson Elser  
909 Fannin Street, Suite 3300, Houston, TX 77010  
713-353-2000  
Subject of Information: Knowledge of the vessel's operation and the incident
5. Representatives of COSCO (Cayman) Mercury Co. Ltd.  
c/o Richard Anthony Branca  
Royston Rayzor Vickery & Williams, LLP  
1415 Louisiana Street, Ste 4200, Houston, TX 77002  
713-224-8380  
Subject of Information: Potential involvement or knowledge of the incident
6. Representatives of Danaos Shipping Co., Ltd.  
c/o Jacob Charles Soto  
Galloway Johnson Tompkins Burr & Smith  
1301 McKinney Street, Ste 1400, Houston, TX 77379  
832-799-2706  
Subject of Information: Potential involvement or knowledge of the incident

7. Svetlana Onyschchenko, Individually and as Representative of the Estate of Yuri Onyschchenko, Deceased; Avtutova Olga Yurievna  
c/o Vanessa D. Gilmore, Anjali Sharma, Sean A. Roberts  
Roberts Markland LLP  
2555 N. MacGregor Way, Houston, Texas 77004  
713-630-0900  
Subject of Information: Personal knowledge of the incident, the deceased, and damages as claimants
8. Habibu Othman Khamis  
c/o Vanessa D. Gilmore, Anjali Sharma, Sean A. Roberts  
Roberts Markland LLP  
2555 N. MacGregor Way, Houston, Texas 77004  
713-630-0900  
Subject of Information: Potential knowledge of the incident and damages as a claimant
9. Representatives of Speedcarrier (No. 3) Corp.  
c/o Kelly C. Hartmann, Trenton J. Wallis, Jacob Charles Soto  
Galloway Johnson Tompkins Burr & Smith  
1301 McKinney Street, Suite 1400, Houston, TX 77379  
713-599-0700  
Subject of Information: Potential involvement or knowledge of the incident
10. Melvin Miller  
Superintendent with CPA  
Address: 1515-C5 E Barbours Cut Blvd, Port Of Houston, TX  
Phone: (832) 407-5246  
Subject of Information: Reported the evacuation of ILA workers from the vessel, potential eyewitness to the incident
11. Tracy Lindsey  
Baytown Fire Department  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Employee Number: 9305  
Assignment: OIC (Officer in Charge)  
Subject of Information: Responded to the fire, participated in rescue operations, authored incident report

12. Patrick Mahoney  
Baytown Fire Department  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Quality control for incident report, may have additional information about the fire response
13. William Fregia  
Baytown Fire Department, Engine 2  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Responded to the fire, participated in rescue operations
14. Caleb Dove  
Baytown Fire Department, Engine 2  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Responded to the fire, participated in rescue operations
15. Randy Birdwell  
Baytown Fire Department, Engine 2  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Responded to the fire, participated in rescue operations
16. Aaron McNeil  
Baytown Fire Department, Medic 2  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Provided medical assistance at the scene
17. Jarren Galvan  
Baytown Fire Department, Medic 2  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Provided medical assistance at the scene
18. Gustabo Torres  
Baytown Fire Department, Tower 7  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Assisted with victim removal from the ship
19. Hayden Phillips  
Baytown Fire Department, Tower 7  
Address: 201 E. Wye Dr. Baytown, TX 77521 (Baytown Fire Department Headquarters)  
Subject of Information: Assisted with victim removal from the ship

20. Phyllis Smith-Dennis  
Harris County Fire Marshal's Office  
Address: 2318 Atascocita, Humble, TX 77396  
Phone: (713) 274-1704  
Email: Phyllis.Dennis@fmo.hctx.net  
Subject of Information: Custodian of records for Harris County Fire Marshal's Office, may have information about the fire investigation

The foregoing designation includes all agents, employees, representatives and records custodians for each individual, business enterprise, healthcare provider and government agency listed. Plaintiff reserves the right to supplement as discovery continues.

B. Documents and tangible things in Plaintiff's possession, custody or control relevant to disputed facts in pleadings:

- Port of Houston PD Fire Call Slip for 24; Port of Houston Police Department Relevance: Contains initial report of the fire and response details
- Port of Houston Police Call Slip for 24 - Port of Houston Police Department Relevance: Contains additional details about the incident and response
- Tracy Lindsey Baytown Fire Department Incident Report (Incident Number: 24000000320) Location: Baytown Fire Department Relevance: Detailed report of the fire department's response and rescue operations
- Harris County Fire Marshal's Office records: Location: Harris County Fire Marshal's Office, 2318 Atascocita, Humble, TX 77396 Relevance: May contain investigation details about the fire
- U.S. Coast Guard records: May contain additional investigation details or maritime incident reports

C. Computation of Damages:

Plaintiff intends to allow the jury to determine the computation of damages.

D. Insurance Agreement:

None.

II. Disclosure of Expert Testimony:

None at this time

VB Attorneys

/s/Brian Beckcom

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Brian Beckcom  
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Brendan Fradkin Pro Hac Vice  
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Houston, Texas 77024  
713-224-7800  
713-224-7801 Facsimile

Certificate of Service

A true and correct copy of the foregoing was served on all counsel of record on this 17th day of October 2024.

/s/ Brian Beckcom

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Brian Beckcom